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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:

Scott William Davis

Group Art Unit: 3683

Serial No.: 10/064,682

Examiner: Thomas J. Williams

Filed: March 6, 2002

For: INTEGRATED PASSENGER VEHICLE TRAILER BRAKE CONTROLLER

Attorney Docket No.: 201-0496 (FGT 1557 PA)

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REPLY BRIEF

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This Reply Brief is being filed in response to the Examiner's Answer dated
September 8, 2004.

The Examiner responds in paragraph 11 of the Answer by way of three responses to the patentability of claims 11 and 20, 23 and 25, and 24 and 26 respectively. In regards to the arguments presented by the Examiner regarding claims 11 and 20, and 24 and 26, the Applicant submits that the positions presented by the Applicant in the Appeal Brief support allowability over the Examiner's objections and requests the Board's consideration.

In regards to the argument presented by the Examiner regarding claims 23 and 25, the Applicant respectfully believes a further clarification of the Applicant's position is justified in response to the Examiner's answer. The Examiner appears in the presented argument to be taking official notice of the use of ramp-up and step-up functions in common anti-lock braking systems. The Applicant respectfully disagrees and calls the Board's attention to the fact that no such evidence to support this assertion is presented. The Applicant notes that anti-lock braking, when activated, commonly involves the rapid release of servos to apply quick braking up to the point of lock and then a quick-release/quick engage function to keep braking at the edge. This is not the ramp-up and step functions as claimed by the present invention. It should be noted that the claim language claims specifically limiting wording that is not anticipated by the common functioning of an anti-lock braking system. The claim language includes:

“gradually ramp-up said trailer brake output in response to a gradual ramp-up of said brake pressure input”:

Anti-lock braking systems do not “gradually ramp-up” braking pressure nor are they even activated by gradual braking pressure as claimed by the present invention.

Furthermore:

“applying a step-function to said trailer brake output signal in response to a sudden increase in said vehicle braking pressure”

The present invention claims applying a step function in response to sudden increase in braking pressure. Anti-lock braking (as asserted by the Examiner) does not apply any step function in response to braking pressure. Rather, it releases braking pressure in response to wheel lock. The Applicant, therefore, asserts that the Examiner’s position is improper and should be overturned by the Board.

ARTZ & ARTZ PC

By: 

Thomas E. Donohue
Registration No. 44,660
28333 Telegraph Road, Suite 250
Southfield, MI 48034
(248) 223-9500

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